

# EXHIBIT 12

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**VIA ELECTRONIC MAIL**

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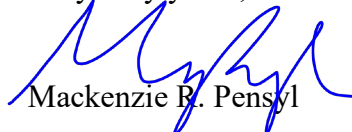
Re: COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as  
Owner and Operator of M/T Mackenzie Rose (IMO No. 8968765), etc.  
United States District Court, Eastern District of Virginia, Case No. 2:24-cv-00490

Dear Mr. Rodgers:

Today, June 13, 2025, counsel for Carver and the Belt Line met and conferred via telephone call regarding Carver's objections to Topic Nos. 8, 9, 12, 20, 22, 23, and 24 of the Belt Line's Rule 30(b)(6) notice of deposition scheduled for next Tuesday, June 17.

On this call, the parties agreed that Carver would treat Topic No. 8 as inquiring about the operational condition of the M/T MACKENZIE ROSE and the competency of her crew, and Carver would provide a witness to testify on those subjects. The parties also agreed that Carver will produce a representative to testify to the remaining topics to which it objected, but preserving its objections for consideration by the Court if necessary. In other words, the witness will answer questions on each topic, subject to such objections. If you have any questions or concerns, please do not hesitate to contact our office.

Very truly yours,

  
Mackenzie R. Pensyl

MRP/tal  
cc: Counsel of Record